

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CARPROOF CORPORATION,

Plaintiff,

v.

HYPERQUEST INC.; AUDATEX,  
HOLDINGS, LLC; AUDATEX HOLDINGS,  
INC.; AUDATEX NORTH AMERICA, INC.;  
AUDATEX CANADA HOLDINGS, INC.;  
AND SOLERA HOLDINGS, INC.,

Defendants.

Case No. 1:15-cv-7385

Hon. Samuel Der-Yeghiayan  
United States District Judge

Hon. Susan E. Cox  
United States Magistrate Judge

**JOINT MOTION TO STAY PROCEEDINGS**

Plaintiff CarProof Corporation (“CarProof”) and Defendants HyperQuest, Inc., Audatex Holdings, LLC, Audatex Holdings, Inc., Audatex Canada Holdings, Inc., and Solera Holdings, Inc. (“Solera”) (collectively, “Defendants”), by and through their undersigned counsel, jointly move the Court to stay these proceedings for a period of 120 days so that the parties, both of which have been acquired by new ownership in the last 90 days, can explore a potential resolution of this matter. In support of their Joint Motion, the Parties state as follows:

1. CarProof initiated this suit on August 21, 2015. (ECF No. 1.)
2. On March 3, 2016, the Court set the deadline for completion of fact discovery for June 3, 2016. (ECF No. 35.) The Court also set deadlines for completion of expert discovery and a briefing schedule for dispositive motions. (*Id.*)
3. Since the beginning of 2016, both CarProof and Solera have been acquired by third parties. These new stakeholders have had initial discussions and wish to seriously explore settlement and preserve resources for that purpose rather than on what will be an expensive

discovery process. The parties estimate they will need 120 days to explore a potential resolution of this lawsuit.

4. Accordingly, the Parties jointly move the Court to stay these proceedings for a period of 120 days through and including August 9, 2016 in order for the parties to attempt a negotiated resolution of this matter.

5. The requested stay will not prejudice any Party. Further, the Parties do not seek this stay for purposes of delay or any other improper purpose, but in order to devote time and resources to a potential resolution of this case.

**WHEREFORE**, Plaintiff CarProof Corporation and Defendants HyperQuest, Inc., Audatex Holdings, LLC, Audatex Holdings, Inc., Audatex Canada Holdings, Inc., and Solera Holdings, Inc. respectfully request that this Court enter an Order (1) staying these proceedings for a period of 120 days through and including August 9, 2016, (2) vacating the case management deadlines specified in this Court's March 3, 2016 scheduling order (ECF No. 35); and (3) granting such other and further relief as the Court deems necessary and just

Dated: April 12, 2016

Respectfully submitted,

/s/ Elizabeth S. Ralph  
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Audatex Holdings, LLC; Audatex Holdings,  
Inc.; Audatex North America, Inc.; Audatex  
Canada Holdings, Inc.; and Solera Holdings,  
Inc.*

Dated: April 12, 2016

CARPROOF CORPORATION

By: /s/ Jesse Basbaum  
One of Their Attorneys

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*Attorneys for Plaintiff*  
*CarProof Corporation*

**CERTIFICATE OF SERVICE**

I, Elizabeth S. Ralph, an attorney, hereby certify that on April 12, 2016, I served the foregoing **JOINT MOTION TO STAY PROCEEDINGS** on all counsel of record via the Court's (ECF) electronic filing service.

/s/ Elizabeth S. Ralph  
One of Defendants' Attorneys